

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
The Dayton Power and Light Company)	Case No. 16-395-EL-SSO
for Approval of its Electric Security Plan)	
In the Matter of the Application of)	
The Dayton Power and Light Company)	Case No. 16-396-EL-ATA
for Approval of Revised Tariffs)	
In the Matter of the Application of)	
The Dayton Power and Light Company)	
for Approval of Certain Accounting)	Case No. 16-397-EL-AAM
Authority Pursuant to Ohio Rev.)	
Code § 4904.13)	

**NOTICE TO TAKE DEPOSITIONS
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
BY SIERRA CLUB**

Pursuant to Ohio Adm. Rule 4901-1-21(B), please take notice that Sierra Club will take the oral deposition of all individuals for whom testimony is filed or will be filed in the above-captioned proceedings, or who have knowledge and expertise with the subject matter of these proceedings, on behalf of the Dayton Power and Light Company ("DP&L") including, but not limited to, the following individuals:

1. All persons who will be called by DP&L to present testimony, including direct, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings.
2. All persons responsible for answering DP&L's interrogatories and/or responding to requests for production of documents (including responses that state that no documents are responsive to a request to produce) served in these proceedings upon DP&L.

Sierra Club seeks to conduct the deposition of R. Jeffrey Malinak upon oral examination at 800 17th Street NW, Washington, DC 20006, at 9:00 a.m., Eastern Time, beginning on

December 20, 2016, or such other time and place that is mutually agreed upon by Sierra Club and DP&L. Sierra Club shall schedule additional depositions at a time mutually agreed to by Sierra Club and DP&L. The depositions will take place from day to day, except for holidays and weekends, until completed. Each deponent will appear at the designated time and date with all requested documents (identified below) and remain present until deposed.

The depositions will be taken of the aforementioned deponents on relevant topics within the scope of these proceedings, including but not limited to, the subject matter of the deponent's testimony and the deponent's knowledge and expertise with the subject matter of these proceedings. The depositions will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, each deponent is requested to produce, two hours prior to the deposition, all documents relating to the deponent's responsibilities with respect to Case Nos. 16-395-EL-SSO, et al. and responses to discovery that were authored by the deponent or were provided to Sierra Club with input from the deponent. Additionally, the deponent shall bring documents, including, but not limited to, the results of any studies done for these proceedings and any backup documents, including raw data for such studies, any documents relied upon or cited in the pre-filed testimony, and any workpapers that support the pre-filed testimony.

Dated: December 2, 2016

Respectfully submitted,

/s/ Tony G. Mendoza

Kristin Henry
Tony Mendoza
Sierra Club
2101 Webster St., 13th Floor
Oakland, CA 94612

(415) 977-5716 (Henry)
(415) 977-5589 (Mendoza)
kristin.henry@sierraclub.org.
tony.mendoza@sierraclub.org

Richard C. Sahli (Ohio Bar #0007360)
Richard Sahli Law Office, LLC
981 Pinewood Lane
Columbus, Ohio 43230-3662
Telephone: (614) 428-6068
rsahli@columbus.rr.com

Chris Bzdok
OLSON, BZDOK & HOWARD, P.C.
420 E. Front St.
Traverse City, MI 49686
231.946.0044
chris@envlaw.com

Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Notice to Take Depositions and Requests for Production of Documents By Sierra Club upon the following parties via electronic mail.

Date: December 2, 2016

s/ Tony G. Mendoza

Tony G. Mendoza

Service List

natalia.messenger@ohioattorneygeneral.gov thomas.mcnamee@ohioattorneygeneral.gov cfaruki@ficlaw.com djireland@ficlaw.com jsharkey@ficlaw.com mfleisher@elpc.org jeffrey.mayes@monitoringanalytics.com evelyn.robinson@pjm.com mkurtz@BKLawfirm.com kboehm@BKLawfirm.com jkylercohn@BKLawfirm.com Schmidt@sppgrp.com fdarr@mwncmh.com mpritchard@mwncmh.com mjsettineri@vorys.com glpetrucci@vorys.com ibatikov@vorys.com smhoward@vorys.com Bojko@carpenterlipps.com ghiloni@carpenterlipps.com kevin.moore@occ.ohio.gov william.michael@occ.ohio.gov joliker@igsenergy.com mdortch@kravitzllc.com laurac@chappelleconsulting.net rparsons@kravitzllc.com stheodore@epsa.org Stephen.Chriss@walmart.com todonnell@dickinsonwright.com	cmooney@ohiopartners.org tdougherty@theoec.org sechler@carpenterlipps.com gpoulos@enernoc.com rick.sites@ohiohospitals.org slesser@calfee.com jlang@calfee.com talexander@calfee.com amy.spiller@duke-energy.com Elizabeth.watts@duke-energy.com lhawrot@spilmanlaw.com dwilliamson@spilmanlaw.com charris@spilmanlaw.com ejacobs@ablelaw.org mwarnock@bricker.com dborchers@bricker.com todonnell@dickinsonwright.com rseiler@dickinsonwright.com dboehm@bkllawfirm.com ebetterton@igsenergy.com Greg.Tillman@walmart.com Jeanne.kingery@duke-energy.com jdoll@djflawfirm.com kfield@elpc.org mcrawford@djflawfirm.com mswhite@igsenergy.com Michelle.d.grant@dynegy.com Attorney Examiner Bryce.Mckenney@puc.state.oh.us Gregory.Price@puc.state.oh.us
---	--

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/2/2016 5:07:31 PM

in

Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM

Summary: Notice of Deposition electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club